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UNITED STATES OF AMERICA

v.

CRIMINAL NO. 1:16 CR99 HSD RHW

TYKAIL DEMOND MOYE, DARRELL DENNIS, MELVIN JERRELL WALKER and MARIO FAIRLEY a/k/a "Mario Knight" 21 U.S.C. § 846 21 U.S.C. § 841(a)(1)

The Grand Jury charges:

#### COUNT 1

That from sometime in January 2014 through the date of this indictment, in George County, in the Southern Division of the Southern District of Mississippi and elsewhere, the defendants, TYKAIL DEMOND MOYE, DARRELL DENNIS, MELVIN JERRELL WALKER and MARIO FAIRLEY a/k/a "Mario Knight", did knowingly and intentionally conspire, with each other and others known and unknown, to possess with intent to distribute methamphetamine, a Schedule II narcotic controlled substance, all as prohibited by Section 841(a)(1), Title 21, United States Code.

All in violation of Section 846, Title 21, United States Code.

# QUANTITY OF CONTROLLED SUBSTANCES INVOLVED IN THE CONSPIRACY

With respect to **TYKAIL DEMOND MOYE**, the amount involved in the conspiracy attributable to him as a result of his conduct, and the conduct of other conspirators reasonably foreseeable to him, is a detectable amount of cocaine hydrochloride, a detectable amount of cocaine base, and in excess of 50 grams of actual methamphetamine in violation of Section

841(b)(1)(A), Title 21, United States Code.

With respect to **DARRELL DENNIS**, the amount involved in the conspiracy attributable to him as a result of his conduct, and the conduct of other conspirators reasonably foreseeable to him, is in excess of 50 grams of actual methamphetamine in violation of Section 841(b)(1)(A), Title 21, United States Code.

With respect to **MELVIN JERRELL WALKER**, the amount involved in the conspiracy attributable to him as a result of his conduct, and the conduct of other conspirators reasonably foreseeable to him, is in excess of 50 grams of actual methamphetamine in violation of Section 841(b)(1)(A), Title 21, United States Code.

With respect to MARIO FAIRLEY a/k/a "Mario Knight", the amount involved in the conspiracy attributable to him as a result of his conduct, and the conduct of other conspirators reasonably foreseeable to him, is in excess of 5 grams of actual methamphetamine in violation of Section 841(b)(1)(B), Title 21, United States Code.

#### COUNT 2

That on or about October 23, 2015, in George County, in the Southern Division of the Southern District of Mississippi and elsewhere, the defendants, **TYKAIL DEMOND MOYE and DARRELL DENNIS**, aided and abetted by each other and others known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute in excess of 5 grams of actual methamphetamine, a Schedule II narcotic drug controlled substance, in violation of Section 841(a)(1), Title 21, United States Code, and Section 2, Title 18, United States Code.

### COUNT 3

That on or about October 27, 2015, in George County, in the Southern Division of the Southern District of Mississippi and elsewhere, the defendant, **DARRELL DENNIS**, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute in excess of 5 grams of actual methamphetamine, a Schedule II narcotic drug controlled substance, in violation of Section 841(a)(1), Title 21, United States Code, and Section 2, Title 18, United States Code.

### COUNT 4

That on or about November 3, 2015, in George County, in the Southern Division of the Southern District of Mississippi and elsewhere, the defendant, **TYKAIL DEMOND MOYE**, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute in excess of 5 grams of actual methamphetamine, a Schedule II narcotic drug controlled substance, in violation of Section 841(a)(1), Title 21, United States Code, and Section 2, Title 18, United States Code.

## COUNT 5

That on or about November 10, 2015, in George County, in the Southern Division of the Southern District of Mississippi and elsewhere, the defendant, **MELVIN JERRELL WALKER**, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute in excess of 50 grams of actual methamphetamine, a Schedule II narcotic drug controlled substance in violation of Section 841(a)(1), Title 21, United States Code, and Section 2, Title 18, United States Code.

#### COUNT 6

That on or about December 2, 2015, in George County, in the Southern Division of the Southern District of Mississippi and elsewhere, the defendant, **TYKAIL DEMOND MOYE**, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute in excess of 5 grams of actual methamphetamine, a Schedule II narcotic drug controlled substance, in violation of Section 841(a)(1), Title 21, United States Code, and Section 2, Title 18, United States Code.

### COUNT 7

That on or about May 31, 2016, in George County, in the Southern Division of the Southern District of Mississippi and elsewhere, the defendant, MARIO FAIRLEY a/k/a "Mario Knight", aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute in excess of 5 grams of actual methamphetamine, a Schedule II narcotic drug controlled substance, in violation of Section 841(a)(1), Title 21, United States Code, and Section 2, Title 18, United States Code.

## NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As a result of committing the offenses as alleged in this Indictment, the defendants shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offenses. Further, if any property described above, as a result of any act or omission of the defendants: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent

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of the United States to seek a judgment of forfeiture of any other property of the defendants, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Section 853, Title 21, United States Code.

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GREGORY K. DAVIS	
United States Attorney	

A TRUE BILL:

s/signature redacted

Foreperson of the Grand Jury

UNITED STATES MAGISTRATE JUDGE